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Counsel for Official Committee of Tort Claimants

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

– and –

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
Case No.: 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF ROBERT A.
JULIAN IN SUPPORT OF OFFICIAL
COMMITTEE OF TORT
CLAIMANTS' LIMITED JOINDER,
OBJECTION AND COUNTER
MOTION TO DEBTORS' WILDFIRE
ASSISTANCE PROGRAM MOTION
(DKT. NO. 1777)**

Date: May 22, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy
Court
Courtroom 17, 16 Floor
San Francisco, CA 94102

1 ROBERT A. JULIAN, under penalty of perjury, declares:

2 1. I am a partner at Baker & Hostetler LLP, counsel to the Official Committee of Tort
3 Claimants of PG&E Corporation and Pacific Gas and Electric Company (collectively the
4 “Debtors”) in these chapter 11 cases.

5 2. I submit this Declaration in support of the Official Committee of Tort Claimants’
6 Limited Joinder, Objection and Counter Motion (“Joinder”) to the Debtors’ Wildfire Assistance
7 Program Motion (Dkt. No. 1777).

8 3. Unless otherwise stated in this Declaration, I have knowledge of the facts set forth
9 herein and, if called as a witness, I would testify thereto.

10 4. Attached hereto as **EXHIBIT A** is a true and correct copy of Pacific Gas & Electric
11 Company Safety Model Assessment Proceeding Prepared Testimony, CPUC, May 1, 2015.

12 5. Attached hereto as **EXHIBIT B** is a true and correct copy of *California North Bay*
13 *Fire Cases*, Judicial Council Coordination Proceeding No. 4955, Master Complaint – Individual
14 Plaintiffs (Cal. Super. Ct. Mar. 12, 2018).

15 6. Attached hereto as **EXHIBIT C** is a true and correct copy of *US v. PG&E*, No. CR
16 14-0175 WHA, Order Adopting New Conditions of Probation (Dkt No. 1040) (N.D. Cal. Apr. 2,
17 2019).

18 7. Attached hereto as **EXHIBIT D** is a true and correct copy of PG&E, Form 8-K
19 (Jan. 13, 2019).

20 8. Attached hereto as **EXHIBIT E** is a true and correct copy of PG&E, Form 8-K
21 (Feb. 28, 2019).

22 9. Attached hereto as **EXHIBIT F** is a true and correct copy of PG&E, Form 10-Q
23 (May 2, 2019).

24 10. Attached hereto as **EXHIBIT G** is a true and correct copy of the hearing transcript
25 from May 7, 2019 in *US v. PG&E*, No. CR 14-0175 WHA (N.D. Cal.)

26 11. Attached hereto as composite **EXHIBIT H** are true and correct copies of signed
27 declarations or letters of fire victims who have suffered and continue to suffer the impact of the
28

1 loss of their homes in fires in 2018, 2017 and 2015, and are submitting collectively in support of
2 the Joinder:

- 3 a. Elizabeth “Libby” Andresen
- 4 b. Landon Andresen
- 5 c. Paul Andresen
- 6 d. Tracy Lynne Arnbrister
- 7 e. Lara Balan
- 8 f. Kevin Burnett
- 9 g. Alex Cranstoun
- 10 h. Robert DeWalt
- 11 i. Lee Ann Estep
- 12 j. Simmon Flagg
- 13 k. James Gaebe
- 14 l. Katherine Gaynor
- 15 m. William Goggia
- 16 n. Kathleen Gross
- 17 o. Jennifer Grove
- 18 p. Kenneth W. Grove, Jr.
- 19 q. Isa Jacoby
- 20 r. Michael Krzanich
- 21 s. Dawn Lazzarino
- 22 t. Janet Lucich
- 23 u. Cindy Ly
- 24 v. Rachel Marin
- 25 w. Leslie Moore
- 26 x. Richard Allen Mootz
- 27 y. Christine Mountain
- 28 z. Kevin Mulder

- 1 aa. Kenneth Nelsen
- 2 bb. Nicholas D. Powell
- 3 cc. Michael Pulliam
- 4 dd. Dominic Romeri
- 5 ee. Faith Lynn Sandoval
- 6 ff. Kenneth Sevenns
- 7 gg. Eric Shoemake
- 8 hh. Judy Simmons
- 9 ii. Michael Slightom
- 10 jj. Tiffany L. Slightom
- 11 kk. Betty J. Taylor
- 12 ll. Cindy Tinker
- 13 mm. Brenda Tucker
- 14

15 *Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true*
16 *and correct to the best of my knowledge and belief.*

17
18 Executed on May 15, 2019

19 /s/ Robert A. Julian
By: Robert A. Julian